

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN E. ARNETT
CHIEF OF STAFF

171521

January 20, 2006

Patrick W. Turner, Esquire
BellSouth Telecommunications, Inc.
1600 William Street, Ste 5200
Columbia, SC, 29201

**RE: BellSouth Telecommunications, Inc.'s Complaint and Request for Summary
Disposition Against NewSouth Communications Corp
Docket No. 2004-63-C**

Dear Mr. Turner:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Mr. Charles L.A. Terreni

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2004-63-C

IN RE:	BellSouth Telecommunications)	OFFICE OF REGULATORY
	Complaint and request for Summary)	STAFF'S FIRST CONTINUING
	Disposition Against NewSouth)	DATA REQUEST
	Communications Corp.)	

TO: Patrick Turner, Esquire, Counsel for BellSouth Telecommunications:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon BellSouth Telecommunications, Inc. (hereafter referred to as "BellSouth").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to BellSouth's proposed South Carolina retail operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That BellSouth provides six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that BellSouth provides an electronic version of the responses.

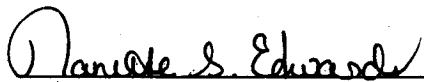
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of BellSouth's responses, the BellSouth witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require BellSouth to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

DATA REQUESTS:

- 1.1 Provide all studies, reports, and/or work papers, that BellSouth relies upon as support for its concern that NewSouth is not in compliance with the local usage options for Enhanced Extended Link ("EELs") set forth in the interconnection agreement between the parties.
- 1.2 Provide a copy of the agreement for service between American Consultants Alliance ("ACA") and BellSouth.
- 1.3 Provide copies of any correspondence between BellSouth and ACA that are related to the proposed audit of NewSouth.
- 1.4 Provide the results of any completed audit for any other state between BellSouth and NewSouth.
- 1.5 How many audits has ACA performed for BellSouth?
- 1.6 What, if any, other work or services has ACA performed for BellSouth, and in what capacity?
- 1.7 Have there been any complaints about the audits performed by ACA?
- 1.8 Has any company successfully challenged the independence and/or quality of work performed by ACA in any other state?
- 1.9 What are the "articulated concerns" in support of BellSouth's audit request referenced on page 23, paragraph 51 of BellSouth's Complaint and what are these concerns based on?
- 1.10 How many EEL audits has BellSouth requested in its nine state region?
- 1.11 How many EEL audits requested by BellSouth have been completed in its nine state region?

- 1.12 Of the number of CLECs that order EELs or request conversion of special access services to EELs, how many has BellSouth requested to audit?
- 1.13 Has BellSouth requested an audit of every company that orders EELs and/or converts special access services to EELs?
- 1.14 Please provide a copy of the proposed audit procedures.
- 1.15 How many EELs has NewSouth ordered in South Carolina?
- 1.16 How many special access circuits has BellSouth converted to EELs in South Carolina for NewSouth?
- 1.17 Has BellSouth filed similar complaints against NewSouth in other states and if so, what were the results of those complaints?
- 1.18 If the response to Data Request 1.17 above is affirmative, please provide the docket or case numbers for each complaint.

January 20, 2006



Wendy B. Cartledge Esquire
Nanette S. Edwards Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, South Carolina 29211
Phone: (803) 737-0800
Fax: (803) 737-0895